

PILLSBURY WINTHROP SHAW PITTMAN LLP
ALBERT J. BORO, JR. (CA Bar # 126657)
albert.boro@pillsburylaw.com
JOANNE H. KIM (CA Bar # 221525)
joanne.kim@pillsburylaw.com
50 Fremont Street
San Francisco, CA 94105
Telephone: (415) 983-1000
Facsimile: (415) 983-1200

Attorneys for Defendant
SHARP ELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Dr. Steven Martel, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Sharp Corporation, et al.,

Defendants.

No. C-06-7888 EDL

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT

STIPULATION FOR EXTENSION OF TIME

WHEREAS plaintiff filed a complaint in the above-captioned case on or about
December 26, 2006;

WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal
Display ("LCD") products;

WHEREAS more than fifteen complaints have been filed to date in federal district
courts throughout the United States by plaintiffs purporting to bring class actions on behalf
of indirect purchasers alleging antitrust violations by manufacturers of LCD products
(collectively, "the LCD Cases");

1 WHEREAS there are motions pending before the Judicial Panel on Multidistrict
2 Litigation to transfer the LCD Cases to the Northern District of California or the District of
3 New Jersey for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. §
4 1407;

5 WHEREAS plaintiff anticipates the possibility of Consolidated Amended
6 Complaints in the LCD Cases;

7 WHEREAS plaintiff and defendant Sharp Electronics Corporation ("SEC") have
8 agreed that an orderly schedule for any response to the pleadings in the LCD Cases would
9 be more efficient for the parties and for the Court;

10 WHEREAS plaintiff agrees that the deadline for SEC to respond to the Complaint
11 shall be extended until the earlier of the following two dates: (1) forty-five days after the
12 filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after
13 plaintiff provides written notice to SEC that he does not intend to file a Consolidated
14 Amended Complaint, provided that such notice may be given only after the initial case
15 management conference in the MDL transferee court in this case;

16 WHEREAS plaintiff further agrees that this extension is available, without further
17 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing
18 of their intention to join this extension;

19 WHEREAS this Stipulation does not constitute a waiver by SEC or any defendant
20 of any defense, including but not limited to the defenses of lack of personal or subject
21 matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper
22 venue.

23 PLAINTIFF AND DEFENDANT SHARP ELECTRONICS CORPORATION, BY
24 AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY
25 STIPULATE AS FOLLOWS:

26 1. The deadline for the SEC to respond to the Complaint shall be extended until
27 the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated
28 Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff provides

written notice that he does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case.

2. This extension is available, without further stipulation with counsel for plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of their intention to join this extension.

IT IS SO STIPULATED.

Dated: January 18, 2007

Signature: /s/ Peter E. Borkon

Robert C. Schubert
Willem F. Jonckheer
Peter E. Borkon
Schubert & Reed LLP
Three Embarcadero Center, Suite 1650
San Francisco, CA 94111

Counsel for Plaintiff Dr. Steven Martel

Dated: January 18, 2007

Signature: /s/ Albert J. Boro, Jr.

Albert J. Boro, Jr.
Joanne H. Kim
Pillsbury Winthrop Shaw Pittman LLP
50 Fremont Street
San Francisco, California 94105

Counsel for Defendant Sharp Electronics Corporation

SO ORDERED:

Dated: January 19, 2007

